

UNITED STATES DISTRICT COURT  
DISTRICT OF VERMONT

UNITED STATES OF AMERICA

v.

SCOTT REMICK,  
Defendant.

Criminal No.

2:21-MJ-67

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Michael McCullagh, being duly sworn, depose and state as follows:

**BACKGROUND OF AFFIANT**

1. I am a Special Agent (SA) with Homeland Security Investigations (HSI). HSI is a directorate within Immigration and Customs Enforcement (ICE). ICE is a subordinate component of the Department of Homeland Security (DHS), a department in the executive branch of the United States of America. ICE is the successor to many of the law enforcement powers of the former Immigration and Naturalization Service and the former U.S. Customs Service. I have been a Special Agent since July 2002. Upon graduating from the Federal Law Enforcement Training Center, I was assigned as a Special Agent for the U.S. Customs Service in the Special Agent in Charge (SAC) New York Office in New York City. In October 2007, I transferred to the Burlington, Vermont Resident Agent in Charge Office, where I presently work. I hold a Bachelor of Science degree in Business Administration from Saint Michael's College. I have been a computer forensic agent (CFA) for my agency since 2006 and have participated in many child pornography and child exploitation investigations. Prior to my employment with HSI, I was a police officer with the Winooski, Vermont Police Department.

2. I have received training specifically in the area of child pornography (as defined in 18 U.S.C. § 2256) and child exploitation. I have, as part of my daily duties as an HSI Special Agent, investigated violations relating to child exploitation and child pornography, including violations pertaining to the possession, distribution, receipt and production of child pornography, the online enticement of minors, and traveling in interstate and foreign commerce to engage in sexual activity with minors, in violation of 18 U.S.C. §§ 2251, 2252, 2252A, 2422, and 2423. I have participated in the execution of numerous search and arrest warrants involving child exploitation and/or child pornography offenses.

3. This affidavit is being submitted in support of a criminal complaint for Scott REMICK (REMICK) for a violation of 18 U.S.C. § 2252(a)(4)(B) – Possession of Child Pornography (the Target Offense).

4. The statements contained in this affidavit are based in part on information provided by members of local, state, and federal law enforcement, my own investigation to include personal observations, documents, and other investigative materials that I have reviewed, as well as my training and experience as a Special Agent with HSI. Since this affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause that REMICK has committed the Target Offense.

#### **STATUTORY AUTHORITY**

5. This investigation concerns alleged violations of the following statute:

a. Title 18, United States Code, Section 2252(a)(4)(B) prohibits a person who “knowingly possesses, . . . any book, magazine, periodical, film, videotape, computer disk, or any other material that contains an image of child pornography that has been mailed, or shipped or transported using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce by any means, including by computer, or that was produced using

materials that have been mailed, or shipped or transported in or affecting interstate or foreign commerce by any means, including by computer.”

**PROBABLE CAUSE**

6. On July 2, 2021, the Honorable Kevin J. Doyle, United States Magistrate Judge for the District of Vermont, authorized a warrant for any law enforcement officer to search electronically stored information on digital devices and media accessing Internet through Waitsfield and Champlain Valley Telecom account 200155513 (the Target), assigned case number 2:21-mj-67 (the Search Warrant). A true and correct copy of the affidavit submitted in support of the Search Warrant is attached hereto as Exhibit A and incorporated herein in its entirety.

7. On July 3, 2021, the Search Warrant was executed by HSI Special Agent Mohamed Bah and HSI Cyber Operations Officer Elijah Brigham. Pursuant to the Search Warrant, law enforcement was able to conduct a remote search and exfiltrate, or extract, files from the Target computer system. I have reviewed some of the exfiltrated files and found some to contain child pornography, which I have described below. In my short review, I believe there could be several hundred images of child exploitation material from the files exfiltrated from the Target computer.

a. Filename 138593152311: This is an image file which depicts a female child who is approximately 8-10 years old. The child is completely nude, laying on a bed with her legs up near her head, exposing her genitals and anus. The nude female child does not appear to have any breast development or pubic hair present.

b. Filename 138769714597: This is an image file which depicts a female child who is approximately 8-10 years old. The child is completely nude, laying on a bed with her legs open, exposing her genitals. An adult male's erect penis can be seen in the bottom of the image,

near her genitals. The nude female child does not appear to have any breast development or pubic hair present.

c. Filename 139563782818: This is an image file depicting a female child who is approximately 8–10 years old. The child is completely nude, laying on a chair with her legs open, exposing her genitals. The nude female child has both of her hands extended into the air with a set of handcuffs on her wrists. The nude female child does not appear to have any breast development or pubic hair present.

d. Filename 139564113241: This is an image file depicting a female child who is approximately 8–10 years old. The child is completely nude, laying on a bed with her legs open, exposing her genitals. The nude female child has legs bent in a manner where her feet are flat on the bed, near her waist. A rope is tied to both of her ankles and is looped through the bed's post. The nude female child's hands are not visible as they are behind her back and under her torso. The nude female child does not appear to have any breast development or pubic hair present.

8. In reviewing the exfiltrated files, I also observed an image file depicting a Vermont Driver's License in the name of Scott REMICK, an image file depicting an insurance card in the name of Scott REMICK, and an image file depicting a business card for Scott I. REMICK, Senior Technology Specialist for Middlebury College. I also observed an image file depicting a detached garage, red in color, which I recognized as being the detached garage at 1153 Hardscrabble Road, Bristol, Vermont, REMICK'S residence.

9. On July 7, 2021, a federal search warrant was executed at 1153 Hardscrabble Road, Bristol, Vermont. An on-scene forensic preview was conducted on a self-built computer identified by REMICK as belonging to him. The forensic preview revealed that the self-built

computer was the same computer as the one on which the exfiltration was conducted. Specifically, the two computers shared many common features, including but not limited to, username/password, internal/external IP address, and the configuration of the storage volumes, such that the Universal Unique Identifier (UUID) was identical. Based on my training and experience, I know that the UUID is a 32 character identifier assigned by the computer's operating system. The UUID is considered unique.

10. During the course of the forensic preview, agents also located thousands of thumbnail images in a thumbnail directory labeled, "normal." Thumbnail images in a thumbnail directory are created by the operating system when the user views a file by double-clicking on it through file manager. I have described some of the thumbnail image files I viewed below.

a. Filename 0ffb54307786a7c8f252bb6a5350f5f0: This is a thumbnail image file depicting a female child, approximately 4–6 years old. She is naked except for socks. The nude female child is lying on her back with her legs open and facing the camera. An erect adult male penis is present between her feet. The nude female child does not appear to have any breast development or pubic hair present.

b. Filename 3be48d393eee4867a96bdb73ae719ca9: This is a thumbnail image file depicting two young female children, who appear to be approximately 8-10 years old. One of the girls is holding an adult male's erect penis. Both girls are touching the adult male's erect penis with their tongues. The image only captures the girls from their shoulders up.

11. Agents also located an encrypted volume using Linux Unified Key Setup (LUKS) on the self-built computer. When agents executed the search warrant, this encrypted volume was unlocked and mounted on the self-built computer. Because it was unlocked and mounted, agents were able to view its contents. Agents observed numerous images from a known series of child

exploitation material called the “Vladmodels.” A preview of some of the images found in the volume depicted young female models posing in various outfits. This series was located in the following directory, media\scott\9f81e15c-5c50-4e13-a6bd-3117d6b69d13\Torrents\qBittorent.finished\My Vlad Models Huge Collection\Vlad Models Huge Collection\y111\_Katya\Custom\Custom 02. I describe one image found in the volume below.

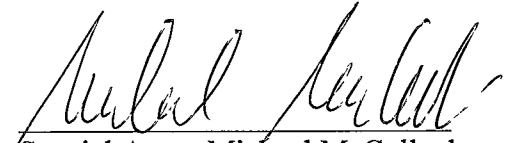
a. DSCF0076: This is an image file depicting a female child approximately 12-years old. The female child is wearing a pink colored cropped shirt, a white thong, and white socks. The female is lying on her back with her legs spread open. She is holding a piece of paper in the air as if she is reading it. The focus of the image is on her genitals, which are barely covered. The female child appears to have some minor breast development visible in other images in the series.

1. Based on my training and experience, I believe that this image depicts child pornography, as that term is defined in 18 U.S.C. § 2256.

12. The self-built computer contained two hard drives. Agents viewed the marking on the hard drives and learned that one was made in China, the other was made in Thailand. By virtue of their presence in Vermont, the hard drives traveled in interstate and foreign commerce.

**CONCLUSION**

13. Based on the facts set forth in this Affidavit, I believe that there is probable cause to believe that a violation of 18 U.S.C. § 2252(a)(4)(B) – Possession of Child Pornography, has been committed by REMICK.



Special Agent Michael McCullagh  
Department of Homeland Security  
Homeland Security Investigations

Subscribed and sworn to before me this 8<sup>th</sup> day of July 2021.



HON. KEVIN J. DOYLE  
UNITED STATES MAGISTRATE JUDGE